

**Andrew Lauersdorf**

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**From:** Davis Jesse B <Jesse.B.Davis@doj.state.or.us>  
**Sent:** Friday, April 16, 2021 9:18 PM  
**To:** Janis Puracal; Robert Franz jr.; Andrew Lauersdorf; Cher Vasquez; Christine Webb; David Owens; Karin Schaffer; Melissa Topic; Sarah Henderson; Graham B. Miller  
**Cc:** Fredrickson Maria; McCarthy Maureen A; Marshall Todd; Chin Elleanor  
**Subject:** McGuffin v. Dannels--protective order  
**Attachments:** McGuffin 1163 PLD Stipulated Protective Order.DOCX

Counsel,

For some time, we've been exchanging discovery with the understanding that the parties and counsel would treat that discovery as confidential and subject to a protective order. I have prepared the attached form of stipulated protective order to formalize the parties' responsibilities with respect to handling discovery. This form is drawn from the court's sample protective order.

Please consider and let me know any question, concerns, or redlines.

Regards,

**Jesse B. Davis**  
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